



QUESTIONS AND ANSWERS

The Leonardo Academy ANSI Standard Development Process and the Sustainable Agriculture Practice Standard (Draft Standard for Trial Use SCS-001)

February 28, 2008 Update

This document provides a list of questions that have been submitted to Leonardo Academy regarding the ANSI process and the draft Sustainable Agriculture Practice Standard, along with short answers. It is periodically updated to include new questions as they are submitted. Response dates are noted in *italics*.

The document is currently divided into four sections:

- Part A. Leonardo Academy and the ANSI Process
- Part B. The Draft Standard for Trial Use
- Part C. Sector Specific Issues
- Part D. Additional Comments for Subcommittee Consideration

A charitable 501(c)(3) nonprofit Think and Do Tank that works to advance sustainability.



Part A: Leonardo Academy ANSI Standard Development Process

This section provides answers to questions related to Leonardo Academy and the ANSI process.

1) What kind of an organization is ANSI? How is it funded? *October 2007, Updated January 2008*

ANSI is a 501(c)3 private, not-for-profit organization, founded in 1918. Comprised of government agencies, organizations, companies, academic and international bodies, and individuals, ANSI represents the interests of more than 125,000 companies and 3.5 million professionals. Its annual budget is \$22 million. ANSI's sources of revenue, based on its 2005-2006 annual report, were as follows:

- 19% - Accreditation Services
- 4% - International Standards Programs
- 5% - Fee-Based Programs
- 2% - Net Investment Gains
- 20% - Membership Dues and Assessment Fees
- 50% - Publications

ANSI is the sole U.S. representative and dues-paying member of the International Organization for Standardization (ISO). As a founding member of the ISO, ANSI plays a strong leadership role in its governing body. For more information about ANSI's history and role in developing standards, please go to: http://www.ansi.org/about_ansi/introduction/introduction.aspx?menuid=1

2) How are ANSI Standards developed? *October 2007, Updated January 2008*

There are two ways to approach the development ANSI standards. One way is through the filing of a PINS (Project Initiation Notification System). A PINS form is required for new and revised standards within the ANSI process. This form results in an announcement in Standards Action and should be submitted early in the standards development process. Only ANSI-accredited standards developers can submit PINS. The second method is through the publication of a draft standard for trial use (DSFTU). The latter route is frequently chosen because it allows the process to begin from a point at which many basic tenets have already been field-tested. The Leonardo Academy is formally accredited by ANSI to handle DSFTUs, as well as standards developed through the PINS process.

In both cases, the ANSI process is used for validating public comment and final approval of the Standard.

More information about Draft American National Standards for Trial Use has been excerpted from the ANSI Essential Requirements and is contained in the Appendix to this document.

3) What is the balloting and comment process? To what degree is a consensus required under the ANSI process? *October 2007, Updated January 2008, Updated February 2008*

Members of the Standards Committee will convene periodically to vote on issues brought forth by the sub-committees. The Committee shall receive copies of all comments accompanying affirmative votes and abstentions, and shall review these comments to determine what, if any, actions will be taken by the Committee to address these comments. All public comments with objections shall be referred to the Standards Committee Chair or the Subcommittee responsible for the part of the



Standard in question to attempt resolution. The Committee may request LEO to obtain further information from the commenter or attempt to correspond with the commenter directly. If substantial changes to the standard are required then changes are subject to letter ballot. If changes are not made to the standard, then the response to the negative comment is subject to approval by vote of the Standards Committee and the commentator is informed in writing of the response. In addition the commenter shall be informed of the appeals process.

Under the ANSI process, a majority vote is required. As such, if the Standards Committee is made up of 40 individuals (10 from each stakeholder segment), 21 votes will constitute a majority. Moreover, under the ANSI process, a consensus will be sought. For every negative vote submitted, efforts will be made to address the concerns raised. If some members of the Standards Committee do not vote, then the majority of those voting is sufficient to pass the issue, provided that all negative votes with comments are addressed, in accordance with the Leonardo Academy *ANSI Standards Development Constitution* (Section 4.7).

It is important to note that members of the Standards Committee who fail to vote on two successive ballots are subject to automatic termination. An open seat would be filled by another representative of the stakeholder group.

4) **How does ANSI accredit potential verifiers of standards?** *October 2007*

The following language from the ANSI website describes ANSI's accreditation service:

“Conformity assessment is defined as a ‘demonstration that specified requirements relating to a product, process, system, person or body are fulfilled.’ There are many of these conformity assessment activities applied in today’s marketplace including accreditation, certification, inspection, registration, supplier’s declaration, and testing. The one dimension that ANSI is directly engaged with is accreditation.

Ultimately, the marketplace and customers of conformity assessment services measure the beneficial value of accreditation. For most suppliers, the primary benefit of accredited third-party certification is to meet a purchaser’s or regulator’s requirement for this independent evaluation of compliance. Increasingly, suppliers’ procurement organizations are specifying accredited, third-party certification as an optional dimension of their systems for risk management.

ANSI’s Accreditation Services

In the area of conformity assessment, ANSI provides accreditation services in the areas of product and personnel certification. This means the Institute recognizes the competence of bodies to carry out product or personnel certification in accordance with requirements defined in International Standards. ANSI’s accreditation programs operate in accordance with international guidelines and have been verified by government and peer review assessments.“

For more information, see web page:

http://ansi.org/conformity_assessment/accreditation_programs/benefits.aspx?menuid=4

The side bar on the web page lists a number of items under “Product Certification Accreditation.”



5) How does ANSI Accreditation of Conformity Assessors deal with guidance on conformity assessment and qualification of conformity assessment providers? *October 2007*

2.6.1 Appeals, complaints, and disputes brought before the Accreditation Committee by certification bodies or other interested parties shall be handled in accordance with Personnel Certification Accreditation Program procedures (PCAC-CA-503).

2.6.2 ANSI shall:

- a) Maintain record of all appeals, complaints, disputes, and mediations relative to accreditation;
- b) Take appropriate corrective and preventive action; and
- c) Document the actions taken and assess their effectiveness.

2.7 Access to Certification Body's Records of Appeals, Complaints and Disputes

The Personnel Certification Accreditation Program requires each applicant and accredited body to make its records of all complaints, appeals, and disputes, and subsequent action available to ANSI, when requested to include during the initial accreditation process and annual surveillance reports.

For more information, see ANSI-PCAC-CA-501 at:

http://www.ansi.org/conformity_assessment/personnel_certification/apply.aspx?menuid=4

6) If a standard contains guidance language on required qualifications of conformity for verifiers of the Standard, are these then included in the ANSI conformity verifier accreditation process? *October 2007*

The process of accrediting third-party verifiers (conformity assessment bodies) can be done through ANSI or through another organization. Guidance language for required qualifications should not be in the Standard, but instead should be incorporated into the policies and procedures which detail the process of granting authority to conformity assessment bodies.

If the accreditation of third-party verifiers is done by ANSI, there would be a supervising entity and an annual review of ANSI procedures of granting authority to field verifiers would take place to ensure that ANSI was following the policies and procedures set forth in the developed guidelines for accreditation or to make alterations to the policies in place. If done by another organization (SCS, LEO, or another organization), the policies and procedures for the accreditation process should follow Guide 65. For more information on Guide 65, see: <http://www.ams.usda.gov./lsg/arc/iso65.htm>

The ACR 1210-A Checklist (linked to in the above web site) provides a reference guide for the documentation needed in developing the procedures and requirements for accreditation.

7) What is the anticipated time commitment for participation in the Standards Committee? *January 2008*

The time commitment will depend on the number of meetings set and whether the member chooses to take on a leadership role. For instance, the Chair and Secretary will require more of a time commitment. Also, members are free to join the subcommittees they are interested in, increasing their time commitment. An estimation would be that participating in the development of the Sustainable Agriculture Standard may take from 1 hour a month to 6 hours a month, depending on the level of involvement the participant chooses.



8) How do interested parties apply to participate on the Standards Committee or subcommittees? *Updated February 2008*

All parties interested in participating on the Standards Committee or subcommittees must complete the application form found on the Leonardo Academy's web site at:

<http://www.leonardoacademy.org/Projects/ansi.htm>.

Applications for participation should be submitted by or before April 7, 2008.

9) What are the number and subject areas of the sub-committees and will they be balanced in terms of membership? *Updated February 2008*

The number of subcommittees has not yet been set. Any self-interested stakeholder can choose to participate. Since all votes are taken at the Standards Committee level, subcommittees are not required to meet the balanced membership requirements of the Standards Committee.

10) What process will the Standards Committee use to determine which sector-specific interest areas to include as Annexes in the standards development process? If the standards committee decides to include a new sector (e.g., dairy or livestock), would this require notice to an additional group of stakeholders? How would this be done and what would be the timeframe? *January 2008, Updated February 2008*

One of the first orders of business for the Standards Committee, which will hold its first meeting in late May, will be to identify issue-specific and sector-specific (i.e., annex-related) subcommittees, based on stakeholder input to date. Subcommittee notices will be posted on the Leonardo Academy website, and through email notification to industry trade publications and to all self-identified interested stakeholders. Additional subcommittees may be suggested and considered by the Standards Committee at any time. The Standards Committee will review the list of potential annexes and other annexes that may be recommended by interested stakeholders and decide whether to proceed with development. Subcommittee involvement is open to all interested parties from any stakeholder segment.

11) Who selects members of the Standards Committee? Why would someone be rejected from being a Committee member? *January 2008, Updated February 2008*

The Standards Committee is the voting body for the standard. It is required to have equal representation from the various stakeholder groups. The Leonardo Academy is solely responsible for the selection of Standards Committee members, based on applications received.

Because there is room for only a limited number of people on the Committee, the Leonardo Academy must be selective in choosing Committee members to ensure representation. There is an appeals process in place that the applicant can pursue if they wish to be reconsidered. However, there are no such limitations to the number of people who can participate in subcommittees that will work on details of the standard. Applicants who are not on the Committee can nevertheless provide significant input through participation in subcommittee and task groups.

12) How do you define stakeholders? What stakeholder groups will participate in the development of the standard? Where do government representatives and academic researchers fit in? *January 2008, Updated February 2008*

The Leonardo Academy constitution approved by ANSI recognizes four stakeholder "interest groups" that must be equally represented in the establishment of standards — producers, users,



environmentalists and general interest. For the purposes of this agriculture standard, these groups would interpreted as follows:

- **Producer** – representative of entity that produces or supplies goods (growers, shippers, packers, farmer organizations,)
- **User** – representative of entity that uses goods (retailers and restaurants, food service companies, product handlers, processors, distributors, and manufacturers).
- **Environmentalist** – individuals and representatives of organizations focused on preserving and improving the environment
- **General Interest** – anyone not in the above categories (government representatives, labor groups and representatives, academic scientists, consumer groups, other interested parties).

13) What is the timeframe for completion of the standard? *January 2008*

The timeframe for completion of the standard is 36 months from the date of publication of the draft standard for trial use, which will be April 12, 2010. Once the final American National Standard is published by ANSI, then the standard is subject to review and mark-up on a periodic basis thereafter.

14) Has a date and location for the next in-person meeting been determined, and if not, when will it? *January 2008*

The next stakeholder orientation meeting has been scheduled to take place February 29, 2008 in Washington DC. See the Leonardo Academy website for details of time and location.

15) How is the development of the Standard being funded? *January 2008*

The Leonardo Academy is in the process of submitting grant applications in order to gain financial assistance for the development of this Standard. We are a charitable nonprofit organization. If you are interested in donating financial resources to support this project, please contact Steve Olson, the Chief Financial Officer of the Leonardo Academy, at steve@leonardoacademy.org or 608-280-0255. Initial seed funding has been provided by Scientific Certification Systems, author of the Draft Standard for Trial Use (SCS-001).

16) Are governmental agencies, such as USDA or EPA, involved in the approval of ANSI standards? *January 2008*

Governmental agencies are considered to be interested stakeholders in the development of ANSI standards, and agency representatives may elect to participate in the development of such standards. In addition, ANSI standards may reference government regulations. However, governmental agencies are not involved in the approval of ANSI standards *per se*.

17) Could you explain in a little more detail the connection between the adoption of the national standard and ISO (referenced above). In ISO negotiations, does the US have to advocate for the “national standard” or is that not mandatory? *February 2008*

ISO standards come about in a couple of different ways: they can be negotiated from scratch, or they can result from the harmonization of national standards. Once ISO decides to pursue harmonization, the US Technical Advisory Group (TAG) determines its position, including advocacy for the national standard, based on consideration of comments made, both in writing and in person.

18) What implications does the national standard have for US trade/tariffs/negotiations with WTO, etc., if any? *February 2008*



WTO rules specifically allow for the development of national standards that are more restrictive to protect the environment of individual countries provided that there are not "technical barriers to trade (TBT)."

19) Can you give an example of a complaint and what types of issues may come up during this process that would be subject to complaint? February 2008

The types of issues that might be subject to complaint relate to such procedural issues as the selection of the Standards committee members, the process of achieving consensus on a particular vote, or by persons who have been or may be affected by any Committee action or inaction. Complaints are processed in a specific manner as stated in the Leonardo Academy ANSI procedures.

20) What will be the position from the standard towards other initiatives. E.g., will there be an option to be benchmarked / to receive mutual recognition? February 2008

This kind of issue will be considered and decided by the Standards Committee.

21) How does someone that is not member of the Standards Committee give input with suggestions or issues to the Committee? February 2008

The Standards Committee members will be participating in the working subcommittees, and will take suggestions and issues back to the Committee for review. It is the responsibility of the subcommittee chair to communicate issues to the Standards Committee. The subcommittees are advisory to the Standards Committee and all final decisions are made by the Standards Committee.

22) Has USDA received notice of the ANSI process? February 2008

Public notice has been provided in a variety of forms: notice in ANSI *Standards Action*, notice of change of SDO in *ANSI Standards Action*, which are widely read by standards organizations and interested parties, including governmental agencies. In addition, there have been public press releases, articles, public presentations, and direct outreach. Representatives from USDA have participated in outreach events. Leonardo Academy maintains a roster of all participants in public outreach events.

23) Are proposed standards to be science-based? February 2008

Yes. Sound science should inform all standards development. Given the complexity of issues addressed within the area of sustainable agriculture, scientific input is critical.



Part B: The Draft Standard for Trial Use

This section provides answers to general (non-sector-specific) questions specifically related to this Draft Standard for Trial Use.

1) When was the Draft Standard for Trial Use announced through ANSI? *October 2007*

April 13 2007. Within the ANSI process, it is important to bear in mind that a DSFTU represents a beginning, not an end. It serves as the starting point from which stakeholder discussions can ensue, and is intended to stimulate dialogue on key issues that must be addressed in order to establish a finalized American National Standard. All interested stakeholders have a role to play in shaping the final standard, working within the open consensus process. Within this non-proprietary inclusive setting, the standard can be developed and enhanced for the public good.

2) What is SCS's role? Why SCS? *January 2008*

SCS prepared the Draft Standard for Trial Use to initiate this ANSI process. SCS has been working on sustainability issues in the agricultural arena for more than two decades, with programs aimed at certifying exceptional levels of achievement in terms of product purity, safety, flavor and nutrition. SCS has also played a major role in helping to establish sustainability standards in other sectors, including forestry and fisheries management. For more information, see “Establishing an American National Standard for Sustainable Agriculture,” downloadable from the Leonardo Academy website, or go to www.scs-certified.com.

3) Why a national sustainable agriculture standard? Why now? *January 2008*

Interest in practicing, defining, standardizing and certifying sustainable agriculture has grown dramatically in the past decade around the globe. This rising level of interest has been fueled by a range of critical environmental and social concerns, such as global warming, water shortages, species extinction, dangerous working conditions, unfair labor practices, and disregard for local communities. In response, dozens of sustainability initiatives and programs — proprietary and collaborative, public and private — have emerged.

A large and growing segment of consumers in the US are actively seeking to support companies whose agricultural products are grown and handled sustainably; however, there is little agreement about what sustainability means. Moreover, there is considerable confusion over, and disagreement about, the relationship between “sustainable,” “organic,” “locally grown,” “IPM” and “food miles.” As the sustainability market heats up, with competing claims and definitions, this confusion is likely to increase. When there is market confusion, and an absence of government regulations, voluntary national standards serve as a vehicle for resolving differences to retain public confidence.

This national standardization initiative has been launched to provide a forum for vetting these differences and capturing the collective wisdom of those individuals and organizations that have been leading the way in defining and establishing sustainable practices. A national, non-proprietary standard that has been vetted in an open, transparent process by key stakeholders can serve many purposes:

- Define sustainability practices and indicators throughout the supply chain on a life-cycle basis.



- Guide producers and handlers through stages of incremental improvement.
- Distinguish best practices in crop production and handling.
- Provide consistent guidance to producers supplying the US market, regardless of country of origin.
- Provide a common set of metrics to gauge sustainability progress — whether in private supply chain, in an industry sector, or on a state/regional/national scale.
- Establish an agreed-upon national framework for future international standardization initiatives.
- Support companies in the development and implementation of supply chain management programs.
- Set a reference benchmark for private sustainability efforts.
- Certify conformance to selected customer requirements/expectations.
- Certify conformance to standard for product labeling.

4) Is the ultimate goal of this effort to require “organic” and not just “sustainable” goods?
January 2008, Updated February 2008

The current draft standard for trial use recognizes that crop production practices are part of the larger mix of issues that are addressed within the context of sustainability. Within the area of crop production, organic pest management and soil fertility practices are recognized as the highest tier of performance. As summarized in the DSFTU, Section 7:

- **Pest/Disease Management**
“The Producer is required to apply least toxic pest and disease management and control systems, integrating organic practices as these are proven to be practical, with organic conversion timeframes to be determined on a per crop, per region basis. Where organic practices are not fully implementable on a practical basis, the Standard establishes minimum requirements related to the use of registered pesticides and fertilizers, integrating practices that minimize the overall use of synthetic pesticides and fertilizers and that direct the Producer toward use of the lowest risk pesticides.
- **Agro-Ecosystem Health: Soil Fertility, Soil Conservation and Erosion Control, and Soil Quality and Functional Biodiversity**
The Producer is required to approach agro-ecosystem health in a manner that maintains or improves the functional biodiversity, as well as “the physical, chemical, and biological condition of the soil and minimizes soil erosion . . . in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances.” . . . Organic soil enhancement and fertility principles and practices are recognized as best practice, for crops and regions where such practices are proven to be practical, including the phase-out of synthetic pesticides and fertilizers; soil fertility, conservation and erosion control practices; biodiversity protection; and plant nutrition.

The central focus of this portion of the standard is the creation of a healthy agroecosystem, along with risk reduction. As shown in 7.1.1.3, a risk matrix is applied in evaluating chemical use, whether synthetic or botanical in origin. This includes an assessment of the practical availability of alternatives, consideration of worker and environmental protection measures, consideration of pest management strategies involving pesticide rotation, etc. Organic practices that would negatively



impact other aspects of sustainability (e.g., water quality, ecosystem health) would not be a practical option from the larger perspective of the standard.

5) On the list of experts consulted, why apparently have no national “mainstream” agriculture and commodity associations been consulted in developing the draft standard? *January 2008*

The draft standard was developed with extensive input, but clearly a much wider net must be cast in the development of the final standard. Agriculture and commodity associations are among the many stakeholders invited to participate in the development of the ANSI standard.

6) You plan to involve producers, handlers, and processors. Will distributors also be involved (e.g., sustainable transportation, delivery, fair practices)? *January 2008*

Yes. The DSFTU defines “handler” as: “The legal entity that is responsible for the storage, processing, conditioning, packaging, distribution, chain of custody and/or sale of agricultural products, and that is not a producer. It includes, but is not limited to, distributors, re-packers, transporters, and brokers, as well as retail establishments.”

7) In terms of pest management, how are you addressing regional and local differences in pest occurrences on crops and control measures? *January 2008*

Regional and local differences will be addressed in sector specific annexes by the respective subcommittees.

8) Will invasive species (plants) be considered? *January 2008, Updated February 2008*

The subject of invasive species has not been directly addressed in the DSFTU; this is an important issue that should be addressed by the Standards Committee. The provisions of the DSFTU that address ecosystem management and protection (Section 8) recognize the planting of native species in buffer zones as a best practice. Other provisions intended to protect habitats indirectly support native species. Further provisions can be considered by the Standards Committee.

9) The proposed ANSI standard seems to include a huge and diverse group of producers, and a wide range of criteria. Can one standard truly cover and still be fair to all of these producers? *January 2008, Updated February 2008*

To address the broad array of agricultural segments addressed by the standard, it is structured in two parts — the core body of the standard, which establishes general requirements applicable across agricultural sectors, and sector-specific annexes, which delve into the issues of unique interest to a specific sector. This structure will allow the standard to expand to meet the needs of many sectors. There is no requirement that such sector-specific annexes be completed within the current timeframe.

10) Is the intent to establish a voluntary minimum wage that is higher than required by law? *January 2008*

The DSFTU provisions on fair labor practices, Section 11, state: “The Producer shall pay workers at least the cash equivalent of the national minimum legal wage or a wage that is consistent with local industry standards, whichever is greater. If workers are paid by production, an objective appraisal of the amount of work to be performed shall be conducted as per ILO Convention 100, and the resultant wages shall meet the above requirements [Add. Ref. 6]. An exception shall be made for migrant workers if national wage laws dictate an alternative wage scale, or allow for partial in-kind payments in accordance with ILO Convention 110.”



11) Do you plan to coordinate with existing processes going on under the ANSI standard-setting process on Biofuels? *January 2008, Updated February 2008*

Yes. If more than one ANSI standard under development is addressing the same issue, then it is the responsibility of the respective SDOs to contact each other to determine where potential overlapping issues may exist, in an effort to coordinate standards development.

12) What if we become certified sustainable through a third party organization program before the draft standard becomes approved as a National Standard? *January 2008, Updated February 2008*

As ANSI standards are voluntary in nature, you are not prevented from pursuing any certification you choose at any time. Once the ANSI standard is finalized, both you and your certification agent will have the opportunity to determine how the existing certification compares. In addition, your selected certifier may seek accreditation to certify against the ANSI standard.

13) What about Affiliate certifications; i.e., retailers? *January 2008*

Retailers are included within the general definition of “handler” within the DSFTU, and could seek certification under the finalized standard.

14) In regard to the development of the draft standard, I see the goal clearly stated to achieve “significant environmental and social benefits”. This certainly fits in with two thirds of the current unofficial definition which we are used to: namely that sustainability is environmentally friendly, socially responsible and economically viable. I see no mention in the draft of the need for economic viability. Why? I do not believe that you can be truly successful and inclusive in this process unless this very important element is appropriately included. *January 2008*

Economic viability issues are addressed under Section 12.3 of the standard, along with other Community Benefits.

15) Isn't EPA already addressing the most hazardous chemicals? Is this the middle ground area between what EPA approves and organic? Newer approved chemistries are supposed to be safer. *January 2008*

The DFSTU adopts a risk-reduction based approach to agrochemicals, calling for the gradual phase-out of chemicals that pose acute or chronic health risks or eco-toxic risks, regardless of whether these chemicals are synthetically or organically derived. It also recognizes that practical limits may exist, and takes into consideration risk mitigation strategies and the availability of alternatives.

16) Will this certification be marketed at a premium price and the goal to be to drive demand for sustainable products? *January 2008*

It is too early to say whether market demand for sustainably produced products will lead to premium pricing. The standard in and of itself does not contain such provisions. The goal of the standard is to help create a common understanding of the principles and practices of sustainable agriculture, and in so doing, to help drive demand for sustainably produced goods.

17) Is a definition of “Sustainable Agriculture Production” provided in the draft standard? Is the draft standard using an existing definition, or providing a new one? *February 2008*



The narrow definition of sustainable agricultural practices provided in the definitions section of the intended to serve as a placeholder only: “Agricultural production and product handling activities that result in the production and delivery of products in a manner that is economically viable, ecologically sound and socially responsible.” There has been considerable debate nationally and internationally about the definition of this term, and it was assumed that the Standards Committee would take up the question of whether such a definition should be provided, and what such a definition would be.

18) Please discuss the current exclusion of genetically modified planting stock in the DSFTU? February 2008

The DSFTU is largely non-prescriptive in terms of specific technologies, methods and innovations available to growers. However, the draft standard follows the precedent of the major existing sustainable agriculture standards currently in use around the world, as well the US National Organic Program, which received wide stakeholder input from a cross-section of interested parties, in adopting the precautionary principle with respect to genetically modified planting materials. There remains considerable concern that while GMOs may offer significant potential benefits, sufficient data have not yet been provided to ensure that use of such materials do not have unintended environmental and human health consequences. Additional arguments have also been made, e.g., the degree to which the patenting of seed stocks runs counter to sustainability principles and may disadvantage small and mid-scale sized farms. Stakeholders who hold a different position are invited to present their views in the Standards Committee and subcommittees that will be considering this issue before the standard is finalized.

19) In the WTO TBT agreement, the US has committed to use international standards as the basis for its standards, yet this one has no references to any international standards. Why is this? Would it conflict with, or should it be considered in relation to relevant international standards, such as the IPPC environmental standard? February 2008.

There are references to numerous international standards in the DSFTU addressing specific issues (e.g., International Labor Organization conventions) — see Section 4. Additional such references may be added by the Standards Committee. However, there is not yet a recognized international standard for sustainable agriculture for crops (e.g. ISO), although many standards are used internationally. Given that ANSI is the official standards body representing the U.S. within the International Organization for Standardization (ISO), if an ISO Task Group is established to harmonize standards, the ANSI standard could become part of these harmonization efforts.

20) In developing the draft standard for trial use, what group standards have you employed to the existing draft? Did you include the Healthy Grown/Protected Harvest standards developed by the U of WI and producers? February 2008

Numerous published standards were consulted in the development of the DSFTU, including the Protected Harvest standards. For a complete list, see the Acknowledgements section in “Establishing an American National Standard for Sustainable Agriculture.”

21) What are the advantages of including specific interest areas as Annexes to the overall sustainable agriculture as opposed to developing a separate ANSI standard for discrete interest areas such as livestock, dairy, and biofuel crops that may be different in significant ways from other agricultural sectors? February 2008

The draft standard was written to focus solely on agricultural crops; it does not address livestock, dairy, or wild crops. With respect to agricultural crops, there are numerous areas of overlap in which



one set of requirements can be developed that are applicable across the board. To the extent that common elements can be identified and standards adopted, educational efforts concerning sustainability issues and innovations will be strengthened. Another advantage is that producers will be able to rely on a single agricultural plan and sustainability management structure, even though details may vary from crop to crop or region to region. The precedent of developing a core set of standards, with sector-specific annexes or supplements, is well established in existing standards for sustainable agriculture.

22) Please define “water capture” as noted in 9.1.1.4. February 2008

This refers to precipitation onto greenhouses or other farm areas that can be channeled into groundwater recharge (on or off farm) as a conservation measure to ensure that run-off does not negatively impact the ecosystem.

23) The word or concept of “health” is not an ecological term — what to you mean by “health”? February 2008

In the context of potential risks from agrochemical usage, the term “health” is used in the context of acute or chronic *human* health risks, such as cancer, reproductive system damage, neurotoxicity, etc.

24) How is the risk matrix to be composed? February 2008

The proposed risk matrix is described in Section 7 of the draft standard. It takes into consideration the following factors: acute human health risks to workers and handlers (EPA Class I-II); chronic human health risk to workers and handlers (Q*), known ecotoxicity (“moderate or greater risk); availability (or lack thereof) of pest/disease management alternatives; adequacy of worker protection measures; adequacy of environmental protection measures.

25) We have heard this standard be described as organic plus? Please explain what that means? I have heard it used two ways. One definition is that organic plus refers to a standard that includes a preponderance of organic practices plus pesticide and fertilizer use where necessary. The other definition is organic practices plus the social aspects of sustainability. February 2008

The term “organic plus” is not part of the current draft standard, but is understood to refer to environmental and/or social requirements applied to organic growers that extend beyond the requirements defined in the US National Organic Program or other recognized organic programs. Other uses of the term may also exist. However, as the current draft standard was written to be applicable to *all* production systems, not only to organic growers, it is not an organic plus standard, nor is its intent to be an organic plus standard.

26) How will some of the guidelines be measured? For example, one of the guidelines refers to packaging. Are there thresholds that are acceptable vs. not acceptable. I haven't seen a measurable system. Please tell me if I have missed it. February 2008

The current draft standard contains a combination of quantitative metrics and process-oriented requirements. Further discussion of metrics and requirements will be a focus of Standards Committee and subcommittee discussions.

27) Are the annexes that are currently in use also open for evaluation, comment and review? February 2008

Yes.



28) To what extent is the “life cycle” of the production process considered? *February 2008*

The life-cycle of the production process informs the entire set of requirements, including, for instance, requirements dealing with packaging materials, energy consumption, greenhouse gases, etc., as well as requirements addressing both producers and handlers of agricultural products.

29) What is the value basis for the high ecological value habitat/species. Will it be national, state/provincial, local or community based? *February 2008*

National, state/provincial, and/or local identification of areas of high ecological value determined under recognized valuation schemes are the basis of this designation.



Part C. Sector-Specific Issues

This section provides answers to questions related to sector-specific issues.

1) Will livestock and dairy production be addressed? *January 2008*

Although the DSFTU does not address livestock or dairy at this time, it will be up to the Standards Committee to determine whether to expand the scope to include such product categories.

2) How will this standard affect nursery and floriculture growers? *January 2008*

Nursery and floriculture growers are covered by the standard. Sector-specific annexes have been published as part of the DSFTU for these sectors.

3) Will VeriFlora be the only organization that will “certify” greenhouse growers? *January 2008*

VeriFlora is a certification brand owned by Scientific Certification Systems (SCS). SCS is currently certifying greenhouse growers. Other certifiers may ultimately choose to certify against the standard.

4) How can VeriFlora begin to certify just with a draft of SCS-001? *January 2008*

The DSFTU is the basis of VeriFlora certification by SCS. This is as a full, functioning standard in the floriculture sector, with a five-year history of development and application in this sector. It is a draft standard in terms of ANSI development and broader applications.

5) Where/when will nursery crops be addressed (trees and shrubs)? **These are not covered by floriculture. *January 2008***

It is anticipated that the current Potted Plant Annex in the standard will be expanded to encompass trees and shrubs, within the timeframe in which the DSFTU achieves final standard status (by 2010).

6) How will landscape contracting and retail garden centers be covered? *January 2008*

These are covered under the handler provisions of the standard.

7) Do you anticipate the need to develop crop-specific annexes for all crops covered by this standard? *February 2008, Updated*

It is anticipated that separate annexes will be developed for specific crops or crop groups. The timeframe for development of such annexes is not fixed or otherwise tied to the timing of the development of the core standard. New annexes may be introduced at any time, pending Standards Committee approval.

8) Do you think it would be better in terms of sustainability to establish a separate process to develop a standard for sustainable animal agriculture, as that sector is quite different from crop agriculture but is at the same time dependent on crop agriculture? *February 2008*

As stated in the answer to question 1, this is a question that should be addressed by, and ultimately can only be answered by, the standards committee. That said, the developer of the draft standard does agree with the premise of the question, but that is only one stakeholder’s perspective.



Part D. Additional Comments for Subcommittee Consideration

This section records comments that have been made for subsequent consideration by the Standards Committee or relevant subcommittees.

- 1) Need to use “substance” and not “chemicals” to remain objective – your terminology now assumes that “chemicals” are bad. Some of the most toxic “substances” are 100% natural, such as arsenic. On the other hand, many “chemicals” are 100% safe. *January 2008*
- 2) It is worth noting that economics is a social science; Sustainability is about taking care of people and taking care of the environment; profitability is covered under social. That is, I think the three-legged stool analogy is not correct. *January 2008*
- 3) The area of economic viability clearly needs further clarification. You referred to inclusion in the category of “social/ economic responsibility” which to most people is certainly different from economic viability. I look forward to assisting in clarifying this area. *January 2008*
- 4) I think there is a need for a Flower & Ornamentals committee. *February 2008*



Appendix 1

Annex B: Draft American National Standards for Trial Use

Excerpt from the ANSI document “ANSI Essential Requirements”:

Draft standards intended for subsequent submittal to ANSI for approval as American National Standards may be published by accredited standards developers for trial use and comment in trade or technical journals, or as separate publications for a period of up to three years. The availability of such draft standards shall be registered with ANSI and announced in ANSI’s *Standards Action*, other appropriate media and, if practical, may be listed in ANSI’s catalog.

Accredited Standards Developers that intend to utilize draft standards for trial use are required to establish procedures for use in connection with their promulgation. Such procedures shall specify how and by whom the decision to promulgate a draft standard for trial use shall be made. Such procedures shall afford materially affected interests the opportunity to challenge the decision to register a draft standard for trial use with ANSI. A copy of such procedures shall be received by ANSI, reviewed and approved by the Executive Standards Council (ExSC) or its designee, and placed on file prior to the submission and announcement of any draft standards for trial use. Draft standards for trial use shall not be issued to address a need for an emergency standard. In addition, draft standards for trial use must be in compliance with the ANSI Patent Policy.

Materially affected interests wishing to initiate a challenge at ANSI to a decision by an Accredited Standards Developer to register with ANSI a draft standard for trial use shall first exhaust all methods of challenge at the Accredited Standards Developer’s level prior to submitting an appeal to the ANSI ExSC. The only basis on which such an appeal shall be filed is the alleged failure of the Accredited Standards Developer to follow either its own procedures or any other relevant ANSI requirements. The burden of proof shall be on the appellant. An announcement regarding the appeal will appear in *Standards Action*. The following statement, or equivalent, shall be included on the front cover of the draft standard for trial use:

“Publication of this draft standard for trial use and comment has been approved by (insert name of accredited standards developer). Distribution of this draft standard for comment shall not continue beyond () months from the date of publication. It is expected that following this () month period, this draft standard, revised as necessary, will be submitted to the American National Standards Institute for approval as an American National Standard. A public review in accordance with established ANSI procedures is required at the end of the trial use period and before a draft standard for trial use may be submitted to ANSI for approval as an American National Standard. This draft standard is not an American National Standard. Suggestions for revision should be directed to”

Use of the ANSI logo or trademark is prohibited on any document that has not been approved as an American National Standard including a draft standard for trial use. If an ANSI-accredited developer complies with these procedures in connection with a draft standard for trial use, it may be referred to as a *Draft American National Standard for Trial Use*. ANSI reserves the right to deny announcement of the availability of a draft standard for trial use that is intended to be submitted for approval as an American National Standard for legal reasons upon advice of its counsel.



Appendix 2

Items posted in January 2008 are responses to questions submitted by the following participants in the December 3, 2007 orientation teleconference:

Andrew Lavigne, American Seed Trade Assn.
Andy Jordan, National Cotton Council
Ben Bolosky, Florida Nursery Growers & Landscape Asso.
Betsy Peterson, California Seed Association
Bill Gerlach, Melissa's
Carrie Kiplinka-Loehr, Northeastern IPM Center, Cornell University
Claude Corcos, Toro Micro-Irrigation
David Ward, Association of Family Farms
Dean Palm, Green Circle Growers
Delilah Onofrey, Editor, Greenhouse Grower magazine
Demie Moore, Aquatrols
Don Hodge, Agriculture Program, US Environmental Protection Agency, Region 9
Doug Cole, DS Cole Growers
Frank Casey, Defenders of Wildlife
Greg Robertson, Pennsylvania Landscape and Nursery Assn.
Greg Wandrey, Pioneer Hi-Bred International, Inc.
Jacques Wolbert, European Certification Body for the Agricultural Sector
Jane Earley, Earley & White Consulting Group
Jason Wadsworth, Wegmans Food Markets
Jennifer Dassel, Tanimura & Antle
John Holmes, Ohio Floriculture Association
Joseph M. DiPaola, Ph. D., Syngenta Plant Health
Julie Callahan, USDA FAS, Office of Scientific and Technical Affairs
Karl Hakanson, Protected Harvest
Kent Bradford, Department of Plant Sciences, University of California
Laura Stec, Innovative Cuisine
Lori Berger, California Specialty Crops Council
Marty Matlock, University of Arkansas
Matthew Elliott, California Environmental Associates
Nikki Rodoni, Gills Onions
Noelle Cremers, California Farm Bureau Federation
Paul Short, Canadian Sphagnum Peat Moss Association
Scott Fulton, B&H Flowers
Terry Humfield, Produce Marketing Association
Walter Ram, The Giumarra Companies
Warren Quinn, American Nursery & Landscape Assn.
Warren Strauss, Monsanto